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**Subject:** RE: Robert Hunter Biden v. Patrick M. Byrne (Case No.: 2:23-cv-09430-SVW-PD) - Informal Discovery Conference Request  
**Date:** Friday, September 13, 2024 1:10:08 PM

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**CAUTION - EXTERNAL:**

Dear Honorable Magistrate Judge Donahue,

I am emailing, with defense counsel copied herein, to inform your Honor that the parties have several pending discovery disputes that they intend to submit to an Informal Discovery Conference with the Court, ranging from disputes over their respective discovery responses, the scheduling of Defendant's deposition, and other matters. The parties wanted to clarify an issue with your Honor however: Will the Court allow the parties to address all such disputes in a single Informal Discovery Conference for the sake of efficiency and expediency? If so, it appears the Court's standing order instructs the parties to brief each such dispute in a separate three-sentence statement to be submitted to your Honor's chambers. Is that correct?

Counsel for both sides were scheduled to conduct our final meet and confer conference via telephone today regarding all pending discovery disputes, but defense counsel has indicated he cannot do so until next Monday now. As such, after the parties' meet and confer conference call on Monday, the parties will plan to jointly submit our respective Informal Discovery Conference statements to your Honor's chambers, as it appears from prior discussions between counsel that such a conference will be necessary regardless.

However, due to the urgency of these disputes and because trial in this matter is set for December 10, 2024 – less than three months from now – to avoid any further delays, I respectfully request that the Court please provide its availability to conduct this Informal Discovery Conference sometime next week. Plaintiff's counsel is available for this Informal Discovery Conference any day next week.

Thank you for your Honor's time and consideration of this matter.

Respectfully,

Zachary Hansen  
Counsel of Record for Plaintiff Robert Hunter Biden



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